



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37<sup>th</sup> Floor  
New York, New York 10278*

October 1, 2024

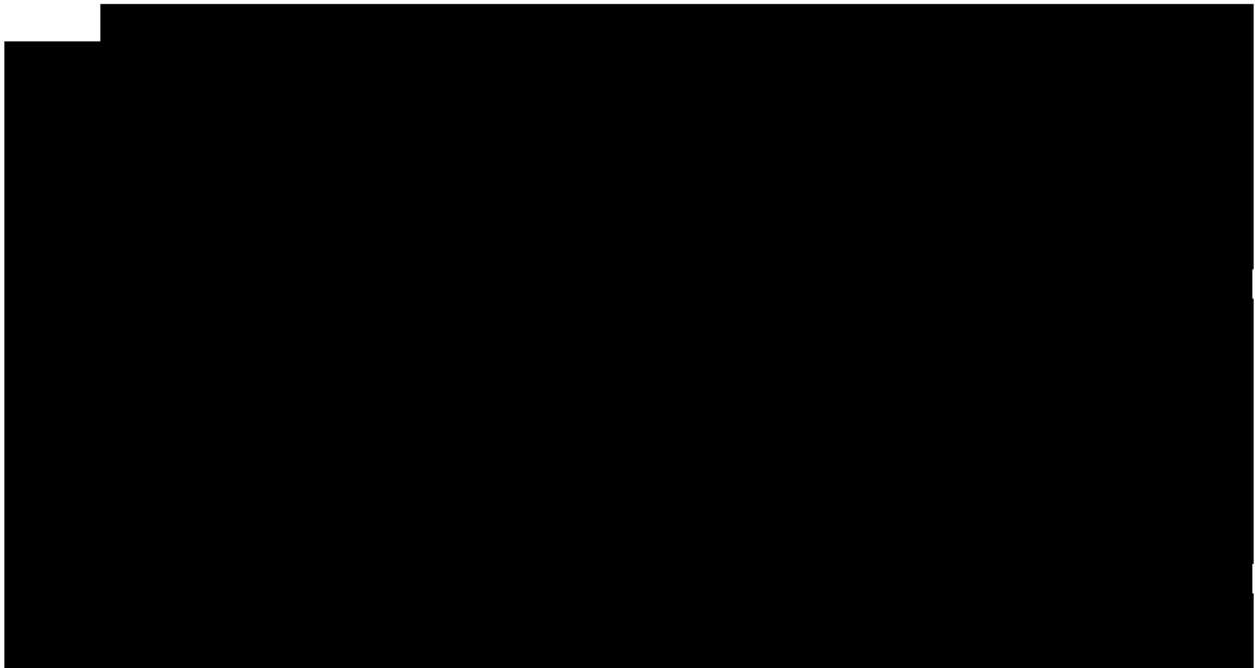
**By Email & ECF**

Hon. Colleen McMahon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: *United States v. Rui-Siang Lin*, 24 Cr. 178 (CM) – Request to be filed partially under seal**

Dear Judge McMahon:

The Government writes in response to the defendant's *ex parte* motion to modify the protective order. (See Dkt. 13.) The protective order was entered on May 31, 2024 with the consent of the parties. (Dkt. 11.) At no time prior to the filing of his motion has the defendant raised with the Government any issues regarding the protective order, nor discussed any possible modifications. Although the Government does not know the basis for the defendant's motion, the Government wishes to share with the Court information that may be relevant to the Court's consideration of that motion. Because the information below relates to the Government's ongoing investigation, the Government submits the below paragraph (marked in red), and the accompanying exhibit, *ex parte* and requests that it be filed under seal.



The Government respectfully requests that the Court consider the foregoing information when assessing the merits of the defendant's *ex parte* motion to modify the protective order; and that the Court should deny any proposed modifications that would undermine the Government's legitimate interest in its ongoing investigation. The Government is available to address any questions the Court may have.

Respectfully submitted,

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